

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W/D OF TN, JACKSON

Rosalyn Rena Springfield

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

TN State Veterans Home

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Rosalyn Rena Springfield
(name of plaintiff)

is a citizen of the United States and resides at 40 Warfield Cove
(street address)

Jackson US TN
(city) (country) (state)

38305 731-460-0132
(zip code) (telephone number)

3. Defendant Tennessee State Veterans Home
(defendant's name)
 lives at, or its business is located at 2865 Main St Humboldt, TN 38343
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at
2865 Main St
Humboldt US (street address) TN 38343
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 20 1 2011
14 3 2011
(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 22 July 2011
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 23 Dec 2011. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) ☐ color, (3) ☒ sex, (4) ☐ religion, (5) ☐ national origin, defendant and retaliation discrimination

(a) ☐ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ☐ failed to promote plaintiff.

(d) _____

I, Rosalyn Rena Springfield was an RN supervisor at Tennessee State Veterans Home (TSVH), which is a 140 bed long-term care facility ~~that is~~^{where} veterans and their spouses live. I was employed there for 4 and a half years, where I proudly served those who served.

My employment was ended on May 10, 2011 and prior to my discharge, I had exhausted all measures to address the discrimination and everything else that is named in my attachment paperwork. I followed policies in the TSVH Employee Handbook by filing grievances internally against staff members on the local and corporate level and had them forwarded to the TSVH Board Members as stated in the employee handbook. and the Employee Grievance Policy was violated on the local, corporate and board level. I had emailed Gov Bill Haslam and all of the TSVH Board Members on May 23, 2011 addressing these and many other issues.

* SEE ATTACHMENT

10. The circumstances under which defendant discriminated against plaintiff were as follows: My former employer, TN State Veterans Home (TSVH), claimed they terminated my employment on 5-10-11 due to refusal of initial training for PT/INR Log and once training was received, refused to keep updated, which wasn't true, as explained in my attachment paperwork. The two white male registered nurses were not terminated for keeping the PT/INR/Coumadin Log updated, nor were the RN supervisors and LPN charge nurses who were responsible for calling doctors on abnormal or critical labs after the lab results arrived between 11:00 AM - 1:00 PM, before administering the Coumadin at 3:00 PM and I was scheduled to work 11-7 shift on week nights and 7p-7a shift on weekends, so how could I cause harm, but not the nursing staff, who were supposed to contact the doctors before administering the medication. Prior to my termination, I had filed grievances citing discrimination concerning another staff member (Yvette Thomas, LPN) who had recently served in the Iraq War and I was retaliated against for it, as mentioned in my attachment paperwork.

11. The acts set forth in paragraph 9 of this complaint and other ways in attachment,

- (a) ☐ are still being committed by defendant.
- (b) ☐ are no longer being committed by defendant.
- (c) ☒ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☐ Defendant be directed to employ plaintiff, or
- (b) ☐ Defendant be directed to re-employ plaintiff, or
- (c) ☐ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to pay punitive damages, lost wages, PTO, accrued retirement and sick days, expunge record, for mental ^{& depression} anguish due to wrongful termination

discrimination, slander, defamation of character, hostile work environment, retaliation

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (☒) No (☐)

Rosalyn Rena Springfield
 SIGNATURE OF PLAINTIFF
 40 Warfield Cove
 Jackson, TN 38305
 731-460-0132